



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

December 11, 2003

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: BRC Rubber Group, Montpelier Division / 009-18225-00002

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

DECEMBER 11, 2003

Mr. Thom Maher
BRC Rubber Group, Montpelier Division
P. O. Box 227
Churubusco, IN 46723

Re: 009-18225
First Minor Permit Modification to
Part 70 No.: T 009-7492-00002

Dear Mr. Maher:

BRC Rubber Group, Montpelier Division was issued a Part 70 permit on July 23, 2000, for a stationary automotive rubber parts manufacturing and coating source. A letter requesting changes to this permit was received on October 9, 2003. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the addition of two (2) hand-spray units and one (1) roll coater to the facility.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0, extension 3-0868, or dial (317) 233-0868.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

mm

cc: File – Blackford County
U.S. EPA, Region V
Blackford County Health Department
Air Compliance Section Inspector – Ryan Hillman
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**BRC Rubber Group, Montpelier Division
623 West Monroe
Montpelier, Indiana 47359**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 009 - 7492 - 00002	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date:

First Reopening No.: 009-13157

Issuance Date: December 4, 2001

First Minor Permit Modification No.: 009-18225	Pages Modified: 8, 32, 32a, 33, 34, 51a, 51b
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 11, 2003

- (v) One (1) roll coater adhesive application system, identified as PB-9, with a maximum coating usage of 13.75 pounds per hour, processing a maximum of 6000 parts per hour, exhausting to stack S21.
- (w) Two (2) hand-spray booths, identified as PB-10 and PB-11, each with a maximum coating usage of 3.25 pounds per hour, processing a maximum of 2000 parts per hour each, equipped with dry filters identified as CE21 and CE22, and exhausting to stacks S23 and S24.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

Other activities with PM less five (5) pounds per hour or twenty-five (25) pounds per day (326 IAC 6-3).

- (a) PMILL, RPRCSS rubber making/primary mill.
- (b) SMILL, RPRCSS rubber making/secondary mill.
- (c) RCOAT, rubber coating.
- (d) PMIX, primary, Banbury mixer.
- (e) SMIX, secondary, Shaw mixer.
- (f) SBIAST, self-contained sand blaster.
- (g) CSILOs, three (3) carbon silos.
- (h) Phosline phosphate line.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.2 (Continued)

FACILITY OPERATION CONDITION

Facility Description [326 IAC 2-7-5(15)]

- (v) One (1) roll coater adhesive application system, identified as PB-9, with a maximum coating usage of 13.75 pounds per hour, processing a maximum of 6000 parts per hour, exhausting to stack S21.
- (w) Two (2) hand-spray booths, identified as PB-10 and PB-11, each with a maximum coating usage of 3.25 pounds per hour, processing a maximum of 2000 parts per hour each, equipped with dry filters identified as CE21 and CE22, and exhausting to stacks S23 and S24.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) The VOC usage of the dip and spin adhesive system, known as DIPSPIN shall be limited to less than twenty-five (25) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit makes 326 IAC 8-1-6 not applicable.
- (b) The VOC usage of the roll coater identified as PB-9 shall be limited to less than twenty-five (25) tons of VOC, including adhesives and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit makes 326 IAC 8-1-6 not applicable.

D.2.2 HAPs [326 IAC 2-4.1-1]

- (a) The HAP usage for a single and combination of HAPs of DIPSPIN shall be limited to less than ten (10) and twenty-five (25) tons per twelve (12) consecutive month period, respectively. In addition, any HAPs delivered to the applicators from the use of clean-up solvents and other materials shall be included in the total potential to emit HAPs from the DIPSPIN operation. Therefore, these HAPs limits will render 326 IAC 2-4.1-1 not applicable to the DIPSPIN.
- (b) The HAP usage for a single and combination of HAPs of the roll coater PB-9 shall be limited to ten (10) and twenty-five (25) tons per twelve (12) consecutive month period, respectively, with compliance determined at the end of each month. These HAPs limits will render 326 IAC 2-4.1-1 not applicable to PB-9.

D.2.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) The particulate matter (PM) overspray from the paint booths, known as PB1 through PB8, and spray booths PB-10 and PB-11 will be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for DIPSPIN and roll coater PB-9.

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.2.5 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing when necessary to determine if these facilities are in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.2.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.6 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 81-4(a)(3) and 326 IAC 81-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.7 HAPs

Compliance with the HAPs usage limitation contained in Condition D.2.2 shall be determined pursuant to 326 IAC 81-4(a)(3) and 326 IAC 81-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.8 VOC and HAPs Emissions

- (a) Compliance with Condition D.2.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.
- (b) Compliance with Condition D.2.2 shall be demonstrated within 30 days of the end of each month based on the single and combination of HAPs usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.9 Particulate Matter (PM)

The dry filters CE-1 through CE-11, and CE20 and the water wash shall be in operation in accordance with manufacturer's specifications at all times that one or more of the spray booths PB-1 through PB-8 is in operation. The dry filters CE21 and CE22 shall be in operation in accordance with manufacturer's specifications at all times that one or both of the spray booths PB-10 or PB-11 is in operation, in order to comply with this limit.

D.2.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks S5 - S8 and S20 while one or more of the paint booths (PB1, PB2, PB3, PB4 and PB8) are in operation. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks S23 and S24 while one or both of the paint booths PB-10 and PB-11, is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a deviation from this permit.
- (b) Daily inspections shall be performed to verify that the water level of the water pans meets the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indi-

cates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks S9, S10, and S11 while one or more of the paint booths (PB5, PB6 and PB7) are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a deviation from this permit.

- (c) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a deviation from this permit.
- (d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.11 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and the VOC and HAPs emission limits established in Conditions D.2.1 and D.2.2 for DIPSPIN and roll coater PB-9.
 - (1) The amount and VOC and HAPs content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC and HAPs usage for each month; and
 - (5) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Conditions D.2.9 and D.2.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: BRC Rubber Group, Montpelier Division
Source Address: 623 West Monroe, Montpelier, Indiana 47359
Mailing Address: 589 U.S. 33 South, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-7492-00002
Facility: Roll Coater PB-9
Parameter: VOC Usage
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	VOC This Month	VOC Previous 11 Months	VOC 12 Month Total
	(tons per month)	(tons per month)	(tons per month)

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: BRC Rubber Group, Montpelier Division
Source Address: 623 West Monroe, Montpelier, Indiana 47359
Mailing Address: 589 U.S. 33 South, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-7492-00002
Facility: Roll Coater PB-9
Parameter: Single and Combination of HAPs
Limit: Less than ten (10) and less than twenty-five (25) tons per twelve (12) consecutive month period, respectively, with compliance determined at the end of each month.

YEAR: _____

Month	Single and Combination HAP This Month	Single and Combination HAP Previous 11 Months	Single and Combination HAP 12 Month Total
	(tons per month)	(tons per month)	(tons per month)

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a Minor Source Modification and a Minor Permit Modification
to a Part 70 Operating Permit**

Source Background and Description

Source Name:	BRC Rubber Group, Montpelier Division
Source Location:	623 West Monroe Street, Montpelier, IN 47359
County:	Blackford
SIC Code:	3069
Operation Permit No.:	T009-7492-00002
Operation Permit Issuance Date:	June 23, 2003
Minor Source Modification No.:	009-18028
Permit Modification No.:	009-18225
Permit Reviewer:	Madhurima D. Moulik

The Office of Air Quality (OAQ) has reviewed a source modification application from BRC Rubber Group, Montpelier Division, relating to the operation of three (3) new hand-spray booths for coating miscellaneous automotive parts and one (1) roll-coater booth to coat inserts with adhesives to be molded with rubber.

New Emission Units and Pollution Control Devices

The source has the following new emission units and pollution control devices:

- (1) One (1) roll coater adhesive application system, identified as PB-9, with a maximum coating usage of 13.75 pounds per hour, processing a maximum of 6000 parts per hour, exhausting to stack S21.
- (2) Three (3) hand-spray booths, identified as PB-10, PB-11, and PB-12, each with a maximum coating usage of 3.25 pounds per hour, processing a maximum of 2000 parts per hour each, equipped with dry filters identified as CE21, CE22, and CE23, and exhausting to stacks S22, S23, and S25.

Existing Approvals

The source was issued a Part 70 Operating Permit 009-7492-00002 on June 23, 2000. The source has since received the following:

- (a) First Reopening No.: 009-13157-00002, issued on December 4, 2001.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temp(°F)
S22	Roll Coater PB-9	24.0	2.0	>2000	Ambient
S23	Spray Booth PB-10	24.0	2.0	>2000	Ambient
S24	Spray Booth PB-11	24.0	2.0	>2000	Ambient
S25	Spray Booth PB-12	24.0	2.0	>2000	Ambient

Recommendation

The staff recommends to the Commissioner that the Minor Source Modification and Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on September 24, 2003.

Emission Calculations

New Units:

Hand-Spray Units PB-10, PB-11, PB-12:

The three (3) new hand-spray booths are identical to the existing booths no. PB-1, PB-2, PB-3, and PB-5.

Therefore, emissions calculations for the new hand-spray booths PB-10, PB-11, and PB-12, are based on emission calculations in the Technical Support Document for T009-7492-00002.

PTE of VOCs for each booth = 12.38 tons per year.

Therefore, for three (3) booths, VOC emissions = 37.14 tons per year.

The source has chosen to remain a PSD Minor source after issuance of this source modification. Therefore, the VOC potential to emit from each of the three hand-spray booths PB-10, PB-11, and PB-12 shall be limited to 10 tons per year. This shall ensure that the total limited VOC PTE remains below 250 tons per year.

PTE (limited) of VOCs from each booth = 10.0 tons per year.

PTE of **PM/PM-10** for each booth = **8.79 tons/yr (uncontrolled)**
= **0.88 (controlled)**

Therefore, for three (3) booths, PM/PM-10 emissions = 26.4 tons/yr
= 2.64 tons/yr.

Roll Coater PB-9:

Maximum usage rate of adhesives = 13.75 lb/hr.

Highest concentration of VOC (weight %) is in adhesive known as CHEMLOCK 255.

Composition of CHEMLOCK 255:

<u>Compound</u>	<u>Weight %</u>
Toluene	40.0
Xylene	35.0
Nitrogen-substituted aromatics	10.0
Ethyl Benzene	10.0

VOC Emissions from PB-9 = 13.75 lb/hr x 0.95 x 8760 hr/yr x 1 ton/2000 lb
= 57.2 tons per year

The source has chosen to take a limit of 25 tons per year for the roll coater in order for this installation to qualify for a minor source modification under 326 IAC 2-7-10.5(d)(4), and for the entire source PTE to remain below 250.0 tons per year (PSD minor limit). This limit will also ensure that 326 IAC 8-1-6 does not apply.

Limited potential to emit of **VOC for PB-9 = 25 tons per year.**

PM emissions are estimated to be negligible.

PB-9 Highest Single HAP Emissions (Toluene) = 24.1 tons per year

PB-9 Combination HAP Emissions = 57.2 tons/yr + 0.56 tons per year (Cobalt Compounds, estimated by source)

= 57.8 tons per year.

The source has chosen to take a limit of ten (10) tons per year and twenty-five (25) tons per year for a combination of HAPs for the roll coater in order for this installation to qualify for a minor source modification under 326 IAC 2-7-10.5(d)(4).

Limited potential to emit of a **single HAP = 10 tons per year.**

Limited potential to emit of a **combination of HAPs = 25 tons per year.**

Potential to Emit of the Source Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Unrestricted Potential to Emit (tons/yr) (each) PB-10, PB-11, PB-12	Limited Potential to Emit (tons/yr) (each) PB-10, PB-11, PB-12	Unrestricted Potential to Emit (tons/yr) PB-9	Limited Potential to Emit (tons/yr) PB-9
PM	8.79	0.88	-	-
PM-10	8.79	0.88	-	-
SO ₂	-	-	-	-
VOC	12.38	10.0 ¹	57.2	< 25
CO	-	-	-	-
NO _x	-	-	-	-

¹ The PTE of VOCs from each of the booths PB-10, PB-11, and PB-12 has been limited to 10 tons per year in order to maintain source's PSD minor status.

HAPs	Unrestricted Potential to Emit (tons/yr) (each) PB-10, PB-11, PB-12	Limited Potential to Emit (tons/yr) (each) PB-10, PB-11, PB-12	Unrestricted Potential to Emit (tons/yr) PB-9	Limited Potential to Emit (tons/yr) PB-9
Single HAP (Highest)	<10	<10	24.1	< 10
Total	<25	<25	57.8	< 25

Justification for the Modification

The Part 70 Operating permit is being modified through a Part 70 minor source and minor permit modification. The minor source modification is being performed pursuant to 326 IAC 2-7-10.5(d)(5) which states that a minor source modification is appropriate for “modifications for which the potential to emit is limited to less than twenty-five (25) tons per year of any regulated pollutant other than hazardous air pollutants, ten (10) tons per year of any single hazardous air pollutant as defined under Section 112 (b) of the CAA, or twenty-five (25) tons per year of any combination of hazardous air pollutants”. The potential to emit of the roll coater shall be limited to 25 tons per year for VOCs and 10 and 25 tons per year for single and combination HAPs. Also, the potential to emit of the three (3) hand-spray units PB-10, PB-11, and PB-12 each fall within the range for minor source modifications as specified in 326 IAC 2-7-10.5(d)(4). The minor source modification will be incorporated into the Part 70 permit through a minor permit modification under 326 IAC 2-7-12(b).

Potential to Emit of the Source After Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Unrestricted Potential to Emit (tons/yr) ¹	Limited Potential to Emit (tons/yr) ¹
PM	270.4	12.9
PM-10	270.4	13.7
SO ₂	0.077	1.08
VOC	298.3	248.7
CO	10.8	13.8
NO _x	12.8	14.8

HAPs	Unrestricted Potential to Emit (tons/yr) ¹	Limited Potential to Emit (tons/yr) ¹
Highest Single HAP	>10	> 10
Total	> 25	> 25

¹ The unrestricted and limited PTE of existing units are based on Technical Support Document for Part 70 No. 009-7492-00002.

County Attainment Status

The source is located in Blackford County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Blackford County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Blackford County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Federal Rule Applicability

- (a) This source is not subject to the New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60, Subpart MM) - Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations, since this source is not an automobile or light-duty truck assembly plant.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) applicable to the three (3) hand-spray booths and one (1) roll coater booth.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The potential to emit of VOCs from the three (3) handspray booths PB-10, PB-11, and PB-12 have been limited to 10.0 tons per year each, and that of the roll coater PB-9 has been restricted to 25.0 tons per year. This limits the source's overall potential to emit of VOCs to less than 250.0 tons per year. The potential to emit of all other criteria pollutants are also below 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories. Therefore, 326 IAC 2-2 does not apply.

The remaining state rule applicabilities for the entire source are unchanged as a result of this modification.

State Rule Applicability – Individual Facilities

326 IAC 1-6-3 (Preventive Maintenance Plan)

A preventive maintenance plan (PMP) is required for the roll coater identified as PB-9, since a VOC emission limit has been applied to avoid the applicability of 326 IAC 8-1-6.

A PMP is not required for the spray booths PB-10, PB-11, and PB-12, since these units have potential VOC emissions below 25 tons per year, each.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements)

The unrestricted potential to emit of the roll coater PB-9 is greater than 25 tons per year. However, the source has agreed to limit the potential emissions to less than twenty-five (25) tons per year. Therefore, 326 IAC 8-1-6 does not apply to PB-9.

The potential VOC emissions from each of the three (3) hand-spray booths PB-10, PB-11, PB-12 are below 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

This source is not one of the listed source types in 326 IAC 8-2-9. Its SIC code of 3069 is not in the major groups of #33, #34, #35, #36, #37, #38 or #39. Therefore, 326 IAC 8-2-9 does not apply to the three (3) hand-spray booths and the roll coater booth.

326 IAC 6-3-2 (Process Operations)

The potential to emit of particulate matter from the roll coater booth PB-9 is less than 0.551 lb/hr. Therefore, PB-9 is exempt from the requirements of this rule.

The particulate matter (PM) from the three (3) hand-spray booths PB-10, PB-11 and PB-12 shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The dry filters CE21, CE22, and CE23 shall be in operation in accordance with manufacturer's specifications at all times any of the spray booths PB-10, PB-11, or PB-12 is in operation, in order to comply with this limit.

The remaining state rule applicabilities for the source are unchanged as a result of this modification.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to the three (3) hand-spray booths PB-10, PB-11, and PB-12, and the roll coater booth PB-9 at this source are as follows:

1. The roll coater PB-9 has applicable compliance monitoring conditions as specified below:
 - (a) The amount of VOC and hazardous air pollutant usage, including cleanup solvents, must be monitored and recorded on a monthly basis. This information must be reported to the Office of Air Quality (OAQ) on a quarterly basis. Material Safety Data Sheets (MSDS) must be kept on file for the coating booth and cleanup solvents used during each quarter.

These monitoring conditions are necessary to ensure compliance with VOC and HAPs emissions limits to avoid the requirements of 326 IAC 8-1-6 and 326 IAC 2-2.

2. The three (3) hand-spray booths PB-10, PB-11, and PB-12 have applicable compliance monitoring conditions as specified below:
 - (a) Monthly inspections shall be performed of the coating emissions from the exhaust stacks and the presence of overspray on the rooftops and the nearby ground.
 - (b) The amount of VOC and hazardous air pollutant usage, including cleanup solvents, must be monitored and recorded on a monthly basis. This information must be reported to the Office of Air Quality (OAQ) on a quarterly basis. Material Safety Data Sheets (MSDS) must be kept on file for the coating booth and cleanup solvents used at each spray booth during each quarter.

These monitoring conditions are necessary to ensure compliance with VOC and HAPs emissions limits to avoid the requirements of 326 IAC 2-2.

Conclusion

This Minor Source Modification No. 009-18028-00002 shall be added to the Part 70 permit as Minor Permit Modification No. 009-18225-00002.

CHANGES TO THE PART 70 PERMIT

The following changes have been made to the Part 70 permit (~~strikeout~~ to show deletions and **bold** to show additions):

(1) The facility descriptions in sections A.2 and D.2 are modified as follows:

- (t) One (1) paint booth (silver machine), known as PB8, equipped with dry filter for PM overspray control, known as CE-20, installed in 1999, exhausting to Stack S20, capacity: 450 automotive parts per hour.
- (u) One (1) dip machine, known DIP, installed in 1999, exhausting to Stack S21, capacity: 1,000 automotive parts per hour.
- (v) **One (1) roll coater adhesive application system, identified as PB-9, with a maximum coating usage of 13.75 pounds per hour, processing a maximum of 6000 parts per hour, exhausting to stack S21.**
- (w) **Three (3) hand-spray booths, identified as PB-10, PB-11, and PB-12, each with a maximum coating usage of 3.25 pounds per hour, processing a maximum of 2000 parts per hour each, equipped with dry filters identified as CE21, CE22, and CE23, and exhausting to stacks S22, S23, and S25.**

(2) The VOC limits for the roll coater booth PB-9 are added to Condition D.2.1 as follows:

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] **and Prevention of Significant Deterioration (PSD)[36 IAC 2-2]**

- (a) **The VOC usage of the dip and spin adhesive system, known as DIPSPIN shall use be limited to less than twenty-five (25) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month.** This usage limit makes 326 IAC 8-1-6 not applicable.
- (b) **The VOC usage of the roll coater identified as PB-9 shall be limited to less than twenty-five (25) tons of VOC, including adhesives and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit makes 326 IAC 8-1-6 not applicable.**
- (c) **The VOC usage of the spray booths PB-10, PB-11, and PB-12 shall be limited to less than ten (10) tons of VOC each, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit, together with potential VOC emissions from other emission units, will make 326 IAC 2-2 not applicable.**

(3) Condition D.2.2 is modified as follows:

D.2.2 HAPs [326 IAC 2-4.1-1]

- (a) ~~The total potential to emit~~ **HAP usage for a single and combination of HAPs from of DIPSPIN shall be limited to less than ten (10) and twenty-five (25) tons per twelve (12) consecutive month period, respectively. In addition, any HAPs delivered to the applicators from the use of clean-up solvents and other materials shall be included in the total potential to emit HAPs from the DIPSPIN operation. Therefore, these HAPs limits will render 326 IAC 2-4.1-1 not applicable to the DIPSPIN.**
- (b) **The HAP usage for a single and combination of HAPs of the roll coater PB-9 shall be limited to ten (10) and twenty-five (25) tons per twelve (12) consecutive month period, respectively, with compliance determined at the end of each month. These HAPs limits will render 326 IAC 2-4.1-1 not applicable to PB-9.**

(3) Section D.2.3 is modified as follows:

D.2.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The particulate matter (PM) overspray from the paint booths, known as PB 1 through PB8, **and spray booths PB-10 through PB-12** will be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

(4) Section D.2.4 is modified as follows:

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for DIPSPIN **and roll coater PB-9**.

(5) Section D.2.9 is modified as follows:

D.2.9 Particulate Matter (PM)

~~The dry filters and water wash for PM control shall be in operation at all times when paint booths, known as PB1 through PB8, are in operation.~~

The dry filters CE-1 through CE-11, and CE20 and the water wash shall be in operation in accordance with manufacturer's specifications at all times that one or more of the spray booths PB-1 through PB-8 is in operation. The dry filters CE21, CE22, and CE23 shall be in operation in accordance with manufacturer's specifications at all times that one or more of the spray booths PB-10, PB-11, or PB-12 is in operation, in order to comply with this limit.

(6) Condition D.2.10 is modified as follows:

D.2.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks S5 - S8 and S20 while one or more of the paint booths (PB1, PB2, PB3, PB4 and PB8) are in operation. **To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks S22, S23, and S25 while one or more of the paint booths PB-10, PB-11, and PB-12 are in operation.** The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a ~~violation of~~ **deviation from** this permit.

(7) Condition D.2.11 is modified as follows:

D.2.11 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and the VOC and HAPs emission limits established in Conditions D.2.1 and D.2.2 for DIPSPIN, **spray booths PB-10, PB-11, PB-12, and roll coater PB-9**.

(8) Part 70 Quarterly Report is added for PB-9 as follows:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: BRC Rubber Group, Montpelier Division

Source Address: 623 West Monroe, Montpelier, Indiana 47359
Mailing Address: 589 U.S. 33 South, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-7492-00002
Facility: Roll Coater PB-9
Parameter: VOC usage
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(9) Part 70 Quarterly Report has been added for single and combination HAP limits for PB-9:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: BRC Rubber Group, Montpelier Division
Source Address: 623 West Monroe, Montpelier, Indiana 47359
Mailing Address: 589 U.S. 33 South, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-7492-00002
Facility: Roll Coater PB-9
Parameter: Single and Combination of HAPs
Limit: Less than ten (10) and less than twenty-five (25) tons per twelve (12) consecutive month period, respectively, with compliance determined at the end of each month.

(10) Part 70 Quarterly Report has been added for the VOC limits on PB-10, PB-11, and PB-12:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: BRC Rubber Group, Montpelier Division
Source Address: 623 West Monroe, Montpelier, Indiana 47359
Mailing Address: 589 U.S. 33 South, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-7492-00002
Facility: Spray Booths PB-10, PB-11, and PB-12, each
Parameter: VOC usage
Limit: Less than ten (10) tons per consecutive twelve (12) month period, with compliance determined at the end of each month.